

KENNETH M. WEINFELD (SBN 116560)  
**CHAUVEL & GLATT, LLP**  
66 BOVET ROAD, SUITE 280  
SAN MATEO, CA 94402  
TELEPHONE: 650-573-9500  
FACSIMILE: 650-573-9689  
EMAIL: [ken@chauvellaw.com](mailto:ken@chauvellaw.com)

Attorneys for Plaintiff Tavershima Shande

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

TAVERSHIMA SHANDE, an individual,  
  
Plaintiff,  
  
v.  
  
ZOOX, INC, a Delaware corporation,  
  
Defendant.

Case No. 3:22-cv-05821-BLF

**DECLARATION OF TAVERSHIMA  
SHANDE IN OPPOSITION TO  
DEFENDANT ZOOX, INC.'S  
ADMINISTRATIVE MOTION TO SEAL  
EXHIBIT 1 TO SPINELLI-MAMO  
DECLARATION**

**DATE:** May 25, 2023  
**TIME:** 9:00 a.m.  
**COURTROOM:** 3, 5<sup>th</sup> Floor  
**JUDGE:** Hon. Beth Labson Freeman

I, Tavershima Shande, declare:

1. I am the plaintiff in this matter. The following is based upon my personal knowledge, and if called to testify I would so state.
2. On or about January 4, 2017, I was offered a job at defendant Zoot, Inc. ("Zoot") via email. A true and correct copy of that email is appended hereto as Exhibit A. Attached to that email

1 was a copy of Zoox's Employee Proprietary Information and Invention Assignment Agreement  
2 ("EPIIAA"). As indicated in the email from Zoox, I did not begin work there until mid-February 2017.

3  
4 3. At no time, whether before, during or after my employment with Zoox, did anyone at the  
5 company describe the material in the EPIIAA document as confidential or indicate that it could not be  
6 shared outside the company. Indeed, it appears to be a standard form agreement, with terms similar to  
7 those contained in comparable agreements I have seen in my work over the years for high tech  
8 companies.  
9

10 4. I had not yet accepted employment with Zoox when I received the EPIIAA, nor had I  
11 agreed to its terms. The first time I heard that Zoox believed either the EPIIAA itself or its terms to be  
12 confidential was when I recently received a copy of Zoox's motion to file it with the Court under seal.  
13

14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct.  
16

17 Dated: January 23, 2023

A handwritten signature in black ink, appearing to read 'T Shande', written over a horizontal line.

TAVERSHIMA SHANDE

## EXHIBIT A

On Wed, Jan 4, 2017 at 10:39 AM <[nick@zoox.com](mailto:nick@zoox.com)> wrote:  
Tav,

It is my pleasure to offer you a full-time position as Technical Artist at Zoox, Inc. beginning on February 13, 2017.

Please see the attached offer letter for details.

If you find this offer agreeable, kindly complete and return the [offer letter](#), the attached Employee Arbitration Agreement and Invention Assignment Agreement at your earliest convenience (and no later than January 8, 2017). Electronic signatures are preferred.

Should you have any questions, please let me know. We are very excited to work with you!

Best,  
Nick

If you are having trouble opening the link, copy-paste the following url into your browser:  
<https://hire.lever.co/signatures/fa1cee70-c4fa-4f72-8fe5-2d41b693d5f3?sigId=efa17ce9-2d1a-4ee8-80fd-753361fa24cf>